

REMARKS

Applicant respectfully requests the Examiner to reconsider the rejections in the Final Office Action of June 6, 2007 and allow all claims.

Claims 11-21 are present in the case. The allowability of claims 16-18 is noted with appreciation.

Claims 14, 19, and 21 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. This rejection is respectfully traversed. The Examiner states that the feeder has not been positively recited and the entirety of the device is the feeder.

In response, the Examiner's attention is invited to parent claim 11. As can be seen by the preamble, it is a device and not a feeder to which claim 11 and its dependent claims 14 and 21 are directed. As stated, the device is for feeding an essentially rectangular piece of cloth to a feeder. Thus, with reference to claims 14 and 21, it should be clear that the recital of an angular range between the direction of a first feed conveyor and the direction of conveyance of the feeder is not a recital of an angle of a device with itself. There are two discrete directions stated -- one is that of the first feed conveyor and the other is that of the direction of conveyance of the feeder. It is submitted that stating an angular relationship between two directions is understandable and that claims 14 and 21 are not indefinite.

It appears that the recital of one element of claim 11 could be improved by the proposed amendment shown in line 7 of this claim. Because it is the device that comprises the boom, it is this device and not the feeder that has at one end of the boom a first feed conveyor, etc. Accordingly, the Examiner is requested to accept this proposed amendment to claim 11 so that the term "device" replaces the term "feeder."

If the Examiner refuses entry of this amendment, he is requested to enter it for purposes of appeal.

The Examiner believes the use of the term “extension” in line 3 of claim 19 is unclear and questions whether the boom extends longitudinally. Claim 19 does not recite that the boom has an extension or extends longitudinally. Claim 19 states that the guide means has an extension oriented in the same direction as the direction of conveyance of the respective feed conveyor. In the embodiment shown and described in the subject application, the guide means is identified by the numeral 13 in Figs. 1, 2, and 4 and described on page 9 of the specification beginning on line 22, and on page 11, in the paragraph beginning on line 7. It is thus submitted that claim 19 is not indefinite.

The Examiner has repeated the rejection of claims 11-13, 15, and 20 under 35 U.S.C. § 102(b) as anticipated by the U.S. Patent to Branch. This rejection is respectfully traversed, and the Examiner is earnestly requested to reconsider this rejection in light of the following comments. The patent to Branch is for sorting laundered garments on hangers, such as the shirts shown and described. Also other items that can be suspended in a similar manner can be sorted, these said in Branch to be fabric pans, machine parts, or the like. No reference is made to a device for feeding the straightened front edge of an essentially rectangular piece of cloth across a boom and then from the boom to a feeder because such structure is not remotely contemplated in Branch.

The Examiner in answer says that Branch conveys a piece of cloth across a boom where the piece of cloth stretches across the boom. It is unclear where in Branch

support for this statement can be found. Branch shows a series of conveyors such as 30, 90, and 92 connected to two, three, or more sorting assemblies where sequential sorting occurs. The conveyors move the shirts by their hangers toward and away from the sorting assemblies. The sorted shirts are eventually removed once sorting is completed. It would serve no purpose to remove a shirt from a hanger and stretch it across a conveyor belt because such shirt could not then be sorted by the Branch apparatus. In other words, such revision of the Branch apparatus would defeat the purpose of Branch.

As an aid to the Examiner, a chart having three columns is being filed with this Request. The first column sets out the elements of claims 11, 12, 13, 15, and 20, the second column states the Examiner's position from page 3, paragraph 5, of the Office Action; and the third column notes the differences. As will be shown in the attached chart, every element of these claims is not present in the Examiner's statements or shown in Branch.

The Examiner is respectfully requested to review this chart as part of the Request for Reconsideration. Because each and every element of the claims in issue cannot be found in Branch, the claimed invention has not been properly anticipated. Allowance of all claims 11-21 is thus earnestly solicited.

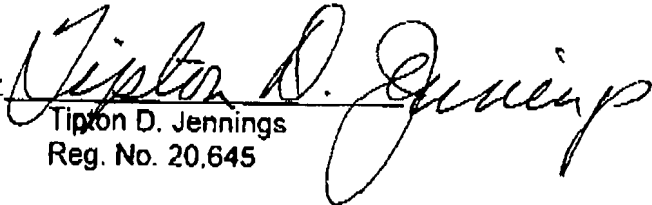
Please grant any extensions of time required to enter this response and charge any required fees to our Deposit Account 06-0916.

Respectfully submitted,

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Dated: September 5, 2007

By:


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Attachment: Three column chart - 3 pages

U.S. Serial No. 10/516,607
Attorney Docket No. 02405.0248

Attachment to
Request for Reconsideration
and Proposed Amendment to Claim 11

| Claims | Examiner's Rejection Under 35 U.S.C. § 102(b) | Differences |
|--|--|---|
| (Claim 11) A device for feeding an essentially rectangular piece of cloth to a feeder comprising: | Jensen discloses a device comprising: (The Preamble was omitted in the Examiner's rejection.) | A claim preamble cannot be ignored and must be construed in the same manner as other claim language. Here, this preamble defines an environment for a device that feeds an essentially rectangular piece of cloth to a feeder. The recitations of the cloth and feeder also appear in the body of the claim. The preamble thus gives meaning to the claim and helps to define the invention. <u>Branch</u> cannot function in the defined environment. |
| a boom extending transversely of the direction of conveyance of the feeder | (This element was omitted in the Examiner's rejection.) | <u>Branch</u> describes the multiple sortation of laundry on hangers. It lacks the concept of a feeder as defined in the preamble and discussed above. Thus, there can be no boom that extends transversely to the direction of conveyance of the feeder. Conveyor 30 in <u>Branch</u> is not a feeder but at best a feed conveyor. |
| wherein the boom comprises a boom conveyor for conveying the piece of cloth across the boom in the longitudinal direction thereof, wherein the piece of cloth stretches across the boom; | A boom comprising a boom conveyor (88,90) | The Examiner fails to address the limitation that the boom conveyor conveys the piece of cloth across the boom in the longitudinal direction thereof, wherein the piece of cloth stretches across the boom. <u>Branch</u> also fails to show the conveyance and stretching of a piece of cloth across the boom. It shows laundered shirts moved along conveyor belts by their hangers. No stretching of the shirt cloth occurs, nor is this contemplated or attainable based on the <u>Branch</u> disclosure. |
| said device [feeder] having, at one end of the boom, a first feed conveyor having a feeding end situated in front of the boom seen in the direction of conveyance of the feeder; | A feeder having a first feed conveyor (30). | On page 2, paragraph 1, of the Office Action, numeral (30) is said to identify a <u>feeder</u> , not a feed conveyor. It can't be both. Assuming that conveyor (30) is intended to be a feed conveyor, the location of the feed conveyor is not disclosed in <u>Branch</u> because without a feeder, "the direction of conveyance of the feeder" is meaningless. Thus, <u>Branch</u> cannot meet this limitation. |

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| Claims | Examiner's Rejection Under 35 U.S.C. § 102(b) | Differences |
|---|---|---|
| the feed conveyor designed to receive, at the feeding end, a straightened front edge of the piece of cloth and transfer the piece of cloth therefrom to the boom conveyor; and | (This limitation was omitted in the Examiner's rejection.) | This is an important limitation in which the feed conveyor receives a straightened front edge of the piece of cloth and transfers it to the boom conveyor. <u>Branch</u> conveys laundered items on hangers on conveyor 30 and fails to teach or show this conveyor receiving and transferring a straightened front edge of a piece of cloth. |
| a first turning device provided between the boom conveyor and the end of the feed conveyor opposite the feeding end for turning and transferring the straightened front edge of the piece of cloth from the feed conveyor to the boom conveyor. | A first turning device (70) provided between the boom conveyor and the end of the feed conveyor opposite the feeding end. | The Examiner fails to address how the rotating wheel 72 of sortation assembly 10 in <u>Branch</u> can turn and transfer the straightened front edge of a piece of cloth. |
| (Claim 12) A device according to claim 11, wherein the boom has an opposite end, and a second feed conveyor is located at the opposite end of the boom and a second turning device provided between the boom conveyor and the second feed conveyor. | A second feed conveyor (260) located at the opposite end of the boom and a second turning device (212) provided between the boom conveyor and the second feed conveyor. | In <u>Branch</u> , item 260 is said to be a collecting rail which collects the sorted, hangered shirts prior to their removal from the sortation assembly. Thus, the Examiner appears to be incorrect in attempting to read this structure on claim 12 because collecting rail 260 cannot function as a feed conveyor. Also, the position of wheel 212 cannot be defined relative to a non-existent second feed conveyor. |
| (Claim 13) A device according to claim 12, wherein the second feed conveyor has a feeding end, and each feeding end is located between the ends of the boom when it is receiving a piece of cloth. | (This claim was not specifically addressed in the Examiner's rejection). | <u>Branch</u> fails to show a second feed conveyor and thus fails to show a feeding end for a second feed conveyor which is located between the ends of the boom when receiving a piece of cloth. |

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| Claims | Examiner's Rejection Under 35 U.S.C. § 102(b) | Differences |
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| (Claim 15) A device according to claim 12, wherein each feed conveyor, each turning device, and the boom conveyor are independent units each having a securing means and guide. | Wherein each turning device, and boom conveyor are independent units comprising each their securing means and guide. | The Examiner omitted any reference to the two feed conveyors because a second feed conveyor is not shown in <u>Branch</u> , and thus cannot have a securing means and guide. |
| (Claim 20) A method of feeding essentially a rectangular piece of cloth to a feeder, comprising the steps of: feeding when in a feeding position, a straightened front edge of the piece of cloth to a feed conveyor, transporting the straightened front edge of the piece of cloth to a second position, seizing by a turning device the straightened front edge of the piece of cloth and turning with an essentially horizontal movement the straightened front edge of the piece of cloth from the second position to a third position, and taking by a boom conveyor when in the third position the straightened front edge of the piece of cloth and conveying it across a boom. | (This claim was not specifically addressed in the Examiner's rejection) | The Examiner was apparently unable to read <u>Branch</u> upon the six steps, each of which requires a mechanical operation upon the straightened front edge of a piece of cloth at various positions in the process. <u>Branch</u> does not operate upon the straightened front edge of a piece of cloth at various positions. |